

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

OKLAHOMA POLICE PENSION FUND
AND RETIREMENT SYSTEM, Individually
and on Behalf of All Others Similarly Situated,

Plaintiff,

v.

TELIGENT, INC. and JASON GRENFELL-
GARDNER,

Defendants.

Case No. 1:19-cv-03354-VM

**JOINT STIPULATION AND [PROPOSED] ORDER REQUESTING EXTENSION
FOR SUBSTANTIAL COMPLETION OF DOCUMENT DISCOVERY AND
SUBSEQUENT DATES**

Lead Plaintiff Oklahoma Police Pension Fund and Retirement System (“Lead Plaintiff” or “Oklahoma Police”) and Defendants Teligent, Inc. and Jason Grenfell-Gardner (“Defendants”) hereby stipulate and agree as follows:

WHEREAS, pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, and the Court’s Order dated June 17, 2020 (ECF No. 46), counsel for the parties submitted a Joint 26(f) Report and Proposed Case Management Plan on July 7, 2020 (ECF No. 49), which this Court entered on July 7, 2020 (ECF No. 50);

WHEREAS, as required, the Case Management Plan provided a Proposed Pre-trial Case Schedule (the “Case Schedule”);

WHEREAS, the Case Schedule called for the Parties to address class certification prior to the completion of certain merits issues (ECF Nos. 56-58);

WHEREAS, in December 2020 and January 2021, in order to facilitate the completion of discovery related to class certification, including from a third party, the Parties sought and the Court granted an extension of the class certification schedule, which had the effect of extending that schedule by approximately three-and-one-half months, such that the Motion for Class Certification will be fully briefed on June 11, 2021 (ECF No. 69);

WHEREAS, though the Parties have made diligent progress on merits discovery, given that pursuant to the Case Schedule they have focused considerable attention on class certification, additional time is required for merits productions and the completion of fact discovery, along with the subsequent events predicated thereon;

WHEREAS, the Parties have met and conferred, and agreed on a schedule that will allow for the orderly completion of fact discovery and the subsequent pre-trial events, which extends the schedule by the same cadence as certification was extended, that is approximately three-and-one-half months;

NOW, THEREFORE, the undersigned parties, through their attorneys and subject to the Court's approval, stipulate and agree to the following new dates:

EVENT	OLD DATES	NEW DATES
Substantial Completion of Document Discovery	February 17, 2021	May 24, 2021
*Interrogatories	August 13, 2021	November 17, 2021
Fact Discovery Deadline	September 24, 2021	January 5, 2022
Expert Disclosures (if any)	November 5, 2021	February 4, 2022
Rebuttal Expert Disclosures (if any)	December 10, 2021	March 16, 2022
*Expert Depositions (if any)	January 21, 2022	April 15, 2022
Summary Judgment and <i>Daubert</i> Motions	April 1, 2022	July 15, 2022

IT IS SO STIPULATED AND AGREED to this 24th day of February, 2021.

SCOTT + SCOTT ATTORNEYS AT LAW LLP <u>s/ Max R. Schwartz</u> Max R. Schwartz Jeffrey P. Jacobson The Helmsley Building 230 Park Avenue, 17th Floor New York, New York 10169 (212) 223-6444 mschwartz@scott-scott.com jjacobson@scott-scott.com <i>Counsel for Lead Plaintiff Oklahoma Police Pension Fund and Retirement System</i>	MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, P.C. <u>s/ Jacob H. Hupart</u> Douglas P. Baumstein Jacob H. Hupart Chrysler Center 666 Third Avenue New York, New York 10017 (212) 935-3000 dbaumstein@mintz.com jhhupart@mintz.com <i>Counsel for Teligent, Inc. and Jason Grenfell-Gardner</i>
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IT IS SO ORDERED:

Honorable Victor Marrero
United States District Judge

Dated: February ____, 2021

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2021, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will automatically provide notice to all counsel of record.

s/ Jacob H. Hupart

Jacob H. Hupart